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9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 SANDRA DE BLANC,

12 Plaintiff,

13 vs.

14 ALOHA AIRPORT EXPRESS, a Foreign
15 Limited Liability Company; DOES 1 through 20;
16 ROE BUSINESS ENTITIES 1 through 20,
17 inclusive jointly and severally,

18 Defendants.

CASE NO.: 2:18-cv-00151-APG-CWH

STIPULATION AND ORDER FOR
EXTENSION OF TIME TO
COMPLETE DISCOVERY
(SECOND REQUEST)

19 Plaintiff, SANDRA DE BLANC, and Defendant, ALOHA AIRPORT EXPRESS, by
20 and through their respective counsel, and pursuant to Local Rule 26-4, stipulate to modify their
21 discovery plan as follows:

22 1. Plaintiff filed her Complaint in the Eighth Judicial District Court for Clark
23 County, Nevada on October 20, 2017. Defendant removed the action to this Court on
24 January 26, 2018 (ECF No. 1).

25 2. The parties held their F.R.C.P. 26 conference on March 5, 2018 and filed their
26 initial Stipulated Discovery Plan and Scheduling Order in compliance with F.R.C.P. 26(f) and
27 LR 26-1(e) on March 7, 2018 (ECF No. 16). The parties filed a Stipulation and Order for
28 Extension of Time to Complete Discovery (First Request) on April 27, 2018. In the first

1 Stipulation for the extension of the discovery deadlines, the parties agreed to the following
2 dates:

| | | |
|----|--|--------------------|
| 3 | Last day to Amend Pleadings/Add Parties: | June 25, 2018 |
| 5 | Initial Expert Disclosure: | July 24, 2018 |
| 6 | Joint Interim Status Report: | July 24, 2018 |
| 7 | Rebuttal Expert Disclosure: | August 24, 2018 |
| 8 | Discovery Cut Off: | September 24, 2018 |
| 9 | Dispositive Motions: | October 23, 2018 |
| 10 | Joint Pre-Trial order: | November 23, 2018 |

11 The Stipulation and Order for Extension of Time to Complete Discovery (First Request)
12 was signed by United States Magistrate Judge Carl W. Hoffman on May 1, 2018 (ECF No. 21).

13 3. In compliance with Local Rule 26-4, the parties provide the following
14 information regarding the discovery status:

15 a. Discovery Completed: The parties have exchanged initial disclosures of
16 witnesses and documents, have served written discovery, Plaintiff's deposition has been taken
17 and the parties have exchanged initial expert disclosures.

18 b. Discovery that remains to be completed: Additional time is needed for
19 Defendant to schedule and conduct the depositions of Plaintiff's expert witnesses
20 William Muir, M.D. and Lane Swainston and Plaintiff to schedule and conduct the depositions
21 of Defendant's driver Daniel Leivas and Defendant's FRCP 30(b)(6) witness Michael Logan,
22 both of whose depositions must be taken out-of-state in Arizona. No further discovery is
23 anticipated at this time; however, additional discovery may be required based upon the
24 deposition testimony of those witnesses. The parties have been diligently working with each
25 other and co-operating with discovery requests as necessary. Based on the foregoing, the
26 parties are requesting additional time to complete the discovery set forth above.

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c. Reasons why discovery was not completed: There is good cause for a sixty (60) day extension of the discovery cutoff deadline. Counsel have been working diligently to attempt to adhere to the current discovery time lines. However, due to the congested schedules of counsel, including trial obligations, the parties require additional time to conclude the limited discovery set forth above. Thus, the request for additional time is being requested. The instant request is not made for purposes of delay. The parties are working diligently to complete all remaining discovery.

d. Proposed schedule for completion of remaining discovery (extension of remaining deadlines by sixty 60 days):

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|---|--------------------------|
| Last day to Amend Pleadings/Add Parties: | CLOSED |
| Initial Expert Disclosure: | CLOSED |
| Joint Interim Status Report: | CLOSED |
| Rebuttal Expert Disclosure: | CLOSED |
| Discovery Cut Off: | November 23, 2018 |
| Dispositive Motions: | December 21, 2018 |
| Joint Pre-Trial order: | January 22, 2019 |

SUBMITTED BY THE FOLLOWING COUNSEL OF RECORD:

DATED this 22nd day of August, 2018.

RICHARD HARRIS LAW FIRM

/s/ Ian C. Estrada

By:

IAN C. ESTRADA, ESQ.
Nevada Bar No. 12575
801 South Fourth Street
Las Vegas, Nevada 89101
Attorneys for Plaintiff

DATED this 22nd day of August, 2018.

WILSON ELSE MOSKOWITZ EDELMAN &
DICKER, LLP

/s/ Christopher D. Phipps

By:

MICHAEL LOWRY, ESQ.
Nevada Bar No. 10666
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300 South Fourth Street, 11th Floor
Las Vegas, Nevada 89101
Attorneys for Defendant
ALOHA AIRPORT EXPRESS, LLC

IT IS SO ORDERED.

DATED: August 24, 2018



C.W. HOFFMAN JR.
UNITED STATES MAGISTRATE JUDGE

1 IT IS SO ORDERED:
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UNITED STATES MAGISTRATE JUDGE

DATED: _____